

MICHAEL T. BEUSELINCK, SBN 251991
MICHAEL BEUSELINCK P.C.
490 43rd Street #37
Oakland, CA 94609
Telephone: (925) 800-3032
mike@lawmtb.com

Attorney for Defendant
ASIACOM AMERICAS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JINJU ZHANG, an individual,
Plaintiff,

v.

BELIN YUAN, an individual; HONG
LIN, an individual; CAMIWELL, INC., a
California corporation; CAMIWELL,
INC. (CANADA), a Canadian
corporation; BEIJING ASIACOM
TECHNOLOGY CO., LTD., a Chinese
corporation; ASIACOM AMERICAS,
INC., a Virginia corporation; BANK OF
AMERICA CORPORATION, a National
Association; and DOES 1 to 20, inclusive,
Defendants.

Case No. 5:23-cv-5818-VC

**DECLARATION OF MICHAEL T.
BEUSELINCK IN SUPPORT OF
DEFENDANT ASIACOM AMERICAS,
INC.'S MOTION TO DISMISS FOR
FAILURE TO STATE A CLAIM**

Time: 10:00 a.m.
Date: August 15, 2024
Judge: Hon. Vince Chhabria
Courtroom: 4—17th Floor

1 I, Michael T. Beuselinck, declare,

2 1. I am an attorney at law and duly licensed to practice before all courts of the State
3 of California. I am an attorney with the office of Michael Beuselinck P.C., attorneys of record for
4 Asiacom Americas, Inc. (“Asiacom US”). I am the custodian of my client’s files in this matter. I
5 have personal knowledge of the following facts, and could testify competently to them.

6 2. Attached hereto as **Exhibit 1** is a true and correct copy of the Complaint for Direct
7 and Derivative Claims for: 1. Breach of Fiduciary Duty; 2. Unfair Competition; 3. Violation of
8 Corporations Code §§ 1601 and 1062; and 4. Accounting that was filed by Plaintiff on July 20,
9 2020, in the Superior Court of the State of California for the County of Santa Clara, Case No.
10 20CV368535.

11 3. I declare under penalty of perjury under the laws of the State of California that the
12 above facts are true and correct.

13
14 Dated: June 12, 2024

/s/ Michael T. Beuselinck